

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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UNITED STATES,

Plaintiff,

v.

No. 23-20191

DEMETRIUS HALEY,

Defendant.

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MOTION TO FILE HALEY'S PRE HEARING MEMORANDUM ON R. 67, 236  
UNDER SEAL

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Comes now the defendant, Demetrius Haley, by and through his counsel of record, and, pursuant to this court's instructions on filing matters under seal in this case and W.D. Tenn. ECF Policy & Procedure 8.1, moves this court to keep his Pre Hearing Memorandum sealed pending trial. In support thereof, Mr. Haley would show:

1. Currently, the jury which will be impaneled to hear this case will be drawn from the Western Division of the Western District of Tennessee. (R. 265, Order Denying Motions to Change Venue).

2. This case has been the subject of substantial media coverage, which is likely to continue.

3. Mr. Haley's pre hearing memorandum, filed herewith as a sealed document, necessarily discusses facts and references discovery, providing the court the information it needs to rule on the motions it has set for a hearing. Public disclosure of this material prior to trial is inappropriate because it would increase the likelihood of potential jurors forming opinions based upon facts not introduced into evidence during the trial.

WHEREFORE, PREMISES CONSIDERED, Mr. Haley prays that, pursuant to W.D. Tenn. ECF Policy & Procedure 8.1, this court order his pre hearing memorandum remain sealed until this case is tried.

Respectfully submitted,

S/Michael J. Stengel

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Certificate of Service

I hereby certify that I have served a copy of the foregoing Motion for Pre Hearing Memorandum to remain sealed pending trial

by electronic means, via the Court's electronic filing system, on AUSA's David Pritchard, Libby Rogers, Kathryn Gilbert, and Forrest Christian and counsel for the co-defendants this 18th day of May, 2024.